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February 7, 2023

BY ECF

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1310
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, No. 03-md-1570 (GBD) (SN);
Petition for a Writ of Mandamus

Dear Judge Daniels:

I, together with Kirsch & Niehaus PLLC, represent Kreindler & Kreindler LLP (the "Firm") in connection with the Firm's motion for a stay of, and Rule 72 objections to, Magistrate Judge Sarah Netburn's Order imposing monetary sanctions and removing the Firm from the Plaintiffs' Executive Committee for Death and Injury Claims.

On February 2, 2023, the Firm filed a letter addressed to your Honor on the public docket, attaching the Firm's petition for a writ of mandamus (the "Petition"), ECF Nos. 8856 & 8856-1, which seeks relief from your Honor's denial of the Firm's stay request. ECF No. 8828. (A copy of the letter and Petition was also sent to your Honor by hand delivery.) After counsel for defendant Kingdom of Saudi Arabia ("KSA") objected to the public filing of one sentence in the Background section of the Petition (Page 7, Section B, second sentence), the Firm requested that the Clerk's Office provisionally seal the Petition to provide the Firm an opportunity to assess the objection. The Firm disagreed with KSA's position but, to avoid burdening the Court with unnecessary motion practice, agreed that all parties should be provided access to the unredacted Petition at ECF No. 8856-1, with a redacted copy of the Petition available to the public. *See* ECF No. 8859.

On February 6, 2023, Magistrate Judge Netburn granted in part and denied in part the unopposed motion. ECF No. 8860. She permitted the Firm to file a redacted Petition on the public docket and required any MDL counsel who wants access to the unredacted Petition to email her Chambers at Netburn_NYSDchambers@nysd.uscourts.gov.

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Accordingly, a copy of the Petition is attached with one sentence redacted on page 7.

Respectfully submitted,

/s/ Edward M. Spiro
Edward M. Spiro
Counsel for Kreindler & Kreindler LLP

cc: All MDL Counsel of Record (via ECF)
Hon. Sarah Netburn (via ECF)